

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

Track Three Cases

MDL No. 2804

Case No. 1:17-md-2804

Judge Dan Aaron Polster

DECLARATION OF ALEX J. HARRIS IN SUPPORT OF
DEFENDANTS' MOTION TO EXCLUDE THE
OPINIONS AND TESTIMONY OF CRAIG MCCANN

Pursuant to 28 U.S.C. § 1746, I, Alex J. Harris, hereby declare as follows:

1. I am an partner in the Denver, Colorado office of Bartlit Beck LLP and counsel for Walgreens Boot Alliance, Inc., Walgreen Co., and Walgreen Eastern Co., Inc. ("Walgreens") in the above-captioned cases.

2. I make this declaration in support of Defendants' Motion to Exclude the Opinions and Testimony of Craig McCann and to place before the Court true and correct copies of the attached documents.

3. Attached as **Exhibit 1** is a true and correct copy of a sealed transcript of case management conference proceedings, dated December 4, 2019.

4. Attached as **Exhibit 2** is a true and correct copy of Exhibit A, Red Flag Criteria, from Plaintiffs' June 2020 Response to Interrogatories.

5. Attached as **Exhibit 3** is a true and correct copy of Exhibit B, Dispensing Red Flag Analysis, from Plaintiffs' June 2020 Response to Interrogatories.

6. Attached as **Exhibit 4** is a true and correct copy of the Track 3 deposition transcript of Craig J. McCann, dated June 11, 2021.
7. Attached as **Exhibit 5** is a true and correct copy of the expert report of Carmen Catizone, dated April 16, 2021.
8. Attached as **Exhibit 6** is a true and correct copy of the expert report of Craig McCann, dated April 16, 2021.
9. Attached as **Exhibit 7** is a true and correct copy of the second supplemental expert report of Craig McCann, dated May 19, 2021.
10. Attached as **Exhibit 8** is a true and correct copy of the supplemental expert report of Carmen Catizone, dated May 19, 2021.
11. Attached as **Exhibit 9** is a true and correct copy of Appendix 14 to the second supplemental expert report of Craig McCann, dated May 19, 2021.
12. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this 23rd day of July, 2021.

/s/ Alex J. Harris
Alex J. Harris
BARTLIT BECK LLP
1801 Wewatta Street, Suite 1200
Denver, CO 80202
(303) 592-3197